

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

KURT AND LAYNE NETHERTON)

COMPLAINANTS)

vs.)

KENTUCKY-AMERICAN WATER COMPANY)

DEFENDANT)

MAY 30 2014

PUBLIC SERVICE
COMMISSION

CASE NO. 2014-00141

**KENTUCKY-AMERICAN WATER COMPANY'S
FIRST REQUESTS FOR INFORMATION TO COMPLAINANTS**

In accordance with the Commission's May 16, 2014 Order in this matter, Kentucky-American Water Company propounds the following requests for information to Complainants Kurt and Layne Netherton. As provided in that Order, responses shall be due no later than June 17, 2014.

1. When did you purchase your residence at 3649 Winding Road Lane?
2. When did you begin occupying the residence at 3649 Winding Road Lane?
3. Please state whether you had a property inspection performed for 3649 Winding Road Lane prior to your purchase of that residence. If so, please provide a copy of the written report of that property inspection.
4. When was your residence at 3649 Winding Road Lane built?
5. List and describe any improvement made to your home since January 1, 2013. Provide the date of the improvement.
6. List each appliance in the residence at 3649 Winding Road Lane that uses water or is connected to the residence's internal plumbing system.
7. List and describe any water-using appliance that Complainants installed or had installed in their residence at 3649 Winding Road Lane after July 1, 2013.

8. State whether since July 1, 2013 any plumbing fixtures at the residence at 3649 Winding Road Lane have been installed, replaced or repaired. If yes, describe the plumbing fixture, the nature of the action (installation, repair, replacement) and the date of the action.
9. Describe all work performed on the residence's piping or internal plumbing system since January 1, 2013.
10. Does the residence at 3649 Winding Road Lane have an in-ground irrigation system? If yes, describe that system.
11. If the residence has an in-ground irrigation system, please state whether the Complainants have used an irrigation service company to service the system and identify the name of the irrigation service company and the names of the individual employees of that entity who performed work on the system.
12. Please provide all dates after July 1, 2013 on which the in-ground irrigation system was serviced or inspected for any reason and provide copies of the job service tickets and invoices for each of those occasions.
13. Please state whether the in-ground irrigation system has leaked since July 1, 2013 and, if the answer is no, please state how you are certain that it has not leaked.
14. Please provide the make and model of the control panel for your in-ground irrigation system and state the year it was installed at 3649 Winding Road Lane.
15. Please state whether, prior to occupying your residence at 3649 Winding Road Lane, you ever occupied a residence with an in-ground irrigation system.
16. Describe the bathroom fixtures that are in the residence at 3649 Winding Road Lane and the approximate date that each fixture was installed.
17. Describe how you verified that there are no leaks on the property as alleged in your Complaint. If persons other than you made the verification or assisted in the verification, identify each of those persons and describe the special skills or training that he or she had to perform that action.
18. State whether, during your efforts to verify that there were no leaks at the residence at 3649 Winding Road Lane, you discovered any situation, such as a toilet flapper valve not reseating or leaking faucet or showerhead, that would have resulted in water usage but not in a sufficient amount to explain the usage in issue.
19. State whether any landscaping or outside renovation work was performed at the residence at 3649 Winding Road Lane since July 1, 2013. If yes, describe the nature of the work and provide copies of job tickets and invoices for that work.

20. State whether, during the period from November 6, 2013 to January 7, 2014, you had guests or visitors to your residence other than the child to whom you refer in your Complaint.
21. State whether, during the period from November 6, 2013 to January 7, 2014, you allowed your faucets to drip to prevent freezing pipes. If yes, state the number of occasions and the length of time they did so.
22. State whether, at any time between November 6, 2013 and January 7, 2014, you or anyone visiting or staying at the residence at 3649 Winding Road Lane used a garden or lawn hose for any activity involving the use of water on the outside of the residence. If such use occurred, describe the usage.
23. State whether you utilize a sump pump at your residence and, if so, describe the power source for that sump pump, i.e., whether it is powered by electricity or if it is a water-powered sump pump.

Respectfully submitted,


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By 
Counsel for Defendant

CERTIFICATE OF SERVICE

This is to certify that the original and 10 copies of the foregoing Requests for Information have been filed on this 30th day of May, 2014 at the Public Service Commission and that a true and accurate copy of same has been served, via U.S. Mail, on the 30th day of May, 2014, upon the following:

Kurt and Layne Netherton
3649 Winding Wood Lane
Lexington, Kentucky 40515


Counsel for Defendant